

Patrick Welsh
Assistant Vice President
Federal Regulatory Affairs



February 23, 2018

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258

Dear Ms. Dortch:

On February 21, Dr. Daniel Vincent, Tamara Preiss of Verizon, and I met with Don Stockdale, Dana Shaffer, Judith Dempsey, Joseph Wyer, Peter Trachtenberg, Jessica Greffenius, Paul Powell, Joyce Jones (via phone), and Kate Matraves (via phone) of the Wireless Telecommunications Bureau on the above-referenced proceeding. Our discussion was consistent with Dr. Vincent's comments in the docket, which describe how a well-functioning and liquid secondary market enables more efficient use of spectrum as conditions vary over time.¹

During the meeting, we expressed support for targeted changes to the licensing regime for Priority Access Licenses ("PALs"). First, we described how license renewability and longer license terms would promote long-term investment in the 3550-3700 MHz band (the "3.5 GHz band"). Second, we urged the FCC to adopt larger geographic areas for PALs. While we recognized that there is no optimal geographic size for all bidders, we explained that it is generally easier to disaggregate down in a secondary market than to aggregate up to a desired size at auction. We noted that as long as licenses can be partitioned and disaggregated post-auction, deviations from optimal license size at auction can be readily corrected in the secondary market.

¹ See Daniel R. Vincent, *Secondary Markets, License Terms and Priority Access Licenses*, GN Docket No. 17-258 (filed Dec. 29, 2017).

Verizon Ex Parte
GN Docket 17-258
February 23, 2018

This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to be "Don Stockdale", with a long horizontal flourish extending to the right.

cc: (via email)
Don Stockdale
Dana Shaffer
Judith Dempsey
Joseph Wyer
Peter Trachtenberg
Jessica Greffenius
Paul Powell
Joyce Jones
Kate Matraves